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OFFICE OF GENERAL  
COUNSEL

BOPP, COLESON & BOSTROM  
ATTORNEYS AT LAW

SEP 11 10 00 AM '95

JAMES BOPP, JR.

ASSOCIATES

RICHARD E. COLESON

BARRY A. BOSTROM

JOHN K. ABEGG

2 FOULKES SQUARE

401 OHIO STREET

P.O. BOX 8100

TERRE HAUTE, INDIANA 47808-8100

TELEPHONE

812/232-2434

FAX

812/235-3685

September 7, 1995

Ms. Dawn Ordrowski, Esq.  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

RE: NRLC Subpoena to Produce Documents

(MUR 3774)

Dear Ms. Ordrowski,

As per our telephone conversation of this afternoon, I am writing on behalf of our client, National Right to Life Committee, to request an extension of the time period in which to comply with the Subpoena to Produce Documents and Order to Submit Written Answers dated August 7, 1995. Although you stated in our conversation that it is not your policy to grant extensions longer than twenty (20) days, we believe that, in the exercise of due diligence, full and accurate compliance with the terms of the Subpoena and Order will require an additional thirty (30) days from the original deadline.

This request for an extension is supported by "good cause" because the sweeping nature of the Subpoena and the Order necessitates a broad and in-depth investigation of activities of the NRLC with respect to alleged contacts between NRLC and at least three other organizations, as well as three political campaigns in 1992 and 1994.

The extensive time-frame involved, the number of people who may have had knowledge of such alleged activities, the great number of documents potentially requested, and the fact that certain information may be extremely difficult - if not impossible - to discover, requires a determination that there is good cause to grant NRLC an extension of the compliance period in order to comply fully with the Subpoena and Order.

The following aspects of the Subpoena and Order are particularly burdensome in that they may require extensive

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investigation which may not be able to be completed within the initial compliance period:

Question 1 requires NRLC to list "all present or former officers, employees, agents, or volunteers" who may have knowledge of alleged payments to NRLC from the National Republican Senatorial Committee. Thus, with respect to each of seven (7) payments set forth in Question 2, NRLC is requested to list every person who may have had "knowledge" of such payment, and the group of persons whose knowledge is sought is not limited merely to officers and employees of NRLC, but also includes those with a more remote relationship to that organization, i.e., "agents and volunteers."

Moreover, the Subpoena addresses the knowledge of persons who may not even have a current relationship with the organization, i.e., "former" officers, employees, agents and volunteers. Merely ascertaining the identity of individuals who may have knowledge, however remote, relating to the extensive list of activities involved, much less investigating the knowledge of each of these individuals, may require more time than is permitted under the initial compliance period.

Question 2 requires the NRLC to identify not only the persons who solicited such alleged payments but the persons to whom such solicitations may conceivably have been made. Thus, this question requires NRLC to identify persons who have an even more tenuous relationship - or perhaps no relationship at all - with the NRLC than that group of persons identified in Question 1. Merely ascertaining the identity of such persons, much less ascertaining the "purpose and substance of each communication relating to or referencing the payment, both before and after the payment was made," may require more time than is permitted under the initial compliance period.

Question 3 requires NRLC to "identify and provide all documents relating to or referencing the payments listed in Question 2, including, but not limited to check copies (front and back, check stubs, invoices, orders, reports, memoranda, letters, understandings, agreements, in-house correspondence, or plans relating to or referencing the timing, purpose and use of the payments." Considering that the nature of the documents requested may have only a remote relationship to the payments (in that they need only "reference" or "relat[e] to" the alleged payments) Question 3 alone will require a thorough review of all of NRLC's records for the periods in question.

Considering the large number of types of documents requested, multiplied by the seven alleged payments, the number of documents requested by Question 3 could conceivably run to the

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hundreds or even thousands. This burden alone may require longer than the initial compliance period.

In addition to these requirements, the majority of the other questions contained in the Questions and Request for Production of Documents place similar burdens on NRLC.

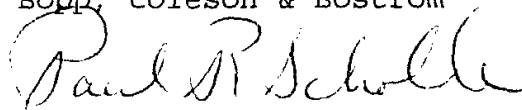
Obtaining accurate answers to the very large amount of information requested, in addition to the production of what may amount to thousands of documents, cannot be accomplished in the exercise of due diligence in the thirty (30) days originally allotted.

Therefore, NRLC hereby requests an extension of an additional thirty (30) days from the original deadline.

Thank you for your kind attention to this matter. I look forward to hearing from you soon.

Sincerely,

Bopp, Coleson & Bostrom

  
Paul R. Scholle

cc: Elizabeth Stein, Esq.